

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

*Plaintiff,*

v.

CELLCO PARTNERSHIP d/b/a VERIZON  
WIRELESS and VERIZON CORPORATE  
SERVICES GROUP, INC.,

*Defendants.*

Case No. 2:23-CV-00352-JRG-RSP

**DEFENDANTS' NOTICE OF FINAL INVALIDITY THEORIES AND EQUITABLE  
DEFENSES**

Pursuant to the Court's July 7, 2025 email correspondence, Defendants Cellco Partnership d/b/a Verizon Wireless and Verizon Corporate Services Group Inc. (collectively, "Verizon") hereby give notice of their final invalidity theories, final prior art references/combinations, and final equitable defenses for the jury trial scheduled to begin on July 17, 2025.

Verizon reserves the right to discuss prior art references, including but not limited to with respect to discussing the background state of the relevant art, non-infringing alternatives, and the lack of technical benefits attributable to the asserted patents over the prior art. Verizon also reserves the right to rely upon any closely related references, including literature that demonstrates the operation and public availability of the prior art.

Verizon does not intend to present any invalidity theories at the jury trial scheduled for July 17, 2025. Pursuant to the Court's ruling at the June 18, 2025 Pre-Trial Conference, to the

extent trial in this matter does not proceed on July 17, 2025, Verizon reserves the right to amend this notice within seven days of receiving a new trial setting.

Verizon intends to present the following equitable defenses: equitable estoppel, acquiescence, implied license, and waiver.

Verizon makes this disclosure based on its current knowledge and understanding of the asserted claims, Headwater's infringement contentions and expert reports, the parties' exhibit lists and other facts and information available as of today's date.

Dated: July 14, 2025

By: /s/ Josh A. Krevitt

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 14, 2025, the foregoing was served upon all counsel of record who have consented to electronic service.

/s/ Josh A. Krevitt  
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